



FLORENCE COPPER INC.

1575 W. Hunt Highway, Florence, Arizona 85132 USA

florencecopper.com

January 3 , 2022

Mr. David Albright
Manager, Groundwater Protection Section
USEPA Region 9 (WTR-4-2)
75 Hawthorne St
San Francisco, CA 94105

Subject: Underground Injection Control (UIC) Permit Number R9UIC-AZ3FY11-1
Monthly Update for AL Exceedance at Supplemental Monitoring Well M60-O

Dear Mr. Albright:

Florence Copper is providing this monthly update of supplemental monitoring well M60-O alert level (AL) exceedance under Underground Injection Control (UIC) Permit Number R9UIC-AZ3FY11-1 (Permit).

Florence Copper has been voluntarily monitoring M60-O monthly for radon, and last submitted a monthly update report on December 1, 2021. Table 1 (attached) has been updated to include the most recent laboratory results from the monthly sample collected on November 10, 2021 and received on December 7, 2021. Results from the monthly sample collected on December 13, 2021 are pending. Level I Indicator parameters remained well under their respective Alert Levels.

Redevelopment of injection and recovery wells in the wellfield continued during the month as part of the ongoing rinsing activities. As part of the next step in the rinsing plan, flows in the wellfield were reversed in December. This included pumping from all four injection wells and injecting at recovery well R09.

Hydraulic gradients were maintained throughout the month, and recovery rates were approximately twice that of injection rates.

Florence Copper will continue monthly sampling of M60-O for radon and will report these results monthly to EPA until the concentration of radon is below the AL.

Please feel free to contact me should you have any questions or comments.

Sincerely,
Florence Copper, Inc.

A handwritten signature in dark ink, appearing to read 'Brent Berg', with a long, sweeping horizontal line extending to the right.

Brent Berg
General Manager

Cc: Nancy Rumrill, EPA Region 9
Maribeth Greenslade, ADEQ

Table 1. M60-O Monthly Sampling Results

Parameter	Radon (pCi/L)
UIC AL	2480
UIC AQL	–
1/7/2021	NA
2/22/2021	NA
3/23/2021	NA
4/14/2021	3073.6 ±308.1
5/18/2021	9129 ±915.6
6/15/2021	2985.3 ±299.4
7/19/2021	3465.5 ±347.5
8/24/2021	3066.1 ±307.7
9/15/2021	2991.0 ±299.9
10/19/2021	3579.0 ±359.0
11/10/2021	3483.9±349.3

BOLD values are exceedance of AL and/or AQL

NA: not analyzed